## Weil, Gotshal & Manges LLP

SO ORDERED.

Application GRANTED. Defendant Lieberman's conditions of bail are hereby modified to permit the temporary return of his wife Bella's passport, from August 22, 2023 to August 24, 2023, to allow her to travel to Montreal, Canada on August 23, 2023, and return to New York the same day. All other conditions of bail shall remain in effect.

767 Fifth Avenue New York, NY 10153-0119 +1 212 310 8000 tel +1 212 310 8007 fax

> Daniel L. Stein +1 (212) 310-8140 Daniel.Stein@weil.com

August 21, 202

un yer K. Klarden Jennifer H. Rearden, U.S.D.J.

Date: Aug, 22, 2023

The Honorable Jennifer H. Rearden United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007-1312

Re: United States v. Menachem Lieberman, 23 Cr. 004 (JHR) USDC SDNY
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ELECTRONICALLY FILED
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DATE FILED: 8/22/2023

Dear Judge Rearden:

We represent Defendant Menachem Lieberman in the above-referenced matter. We write now, with the consent of the Government and Pretrial Services, to request a temporary modification of bail conditions.

As a condition of Mr. Lieberman's release, his wife and minor children surrendered their passports. Mr. Lieberman's wife, Bella Lieberman, needs to travel to Montreal, Canada this Wednesday, August 23 and is planning to return to New York later that evening, so that she may attend meetings related to a daycare center in Montreal that she helps to manage. Accordingly, we respectfully request that the Court permit the return of Mrs. Lieberman's passport on Tuesday, August 22, with the understanding that it would be returned on Thursday, August 24. A similar request was previously granted and Mrs. Lieberman returned as scheduled. Mr. Lieberman's assigned Pretrial Services officer has indicated by phone that Pretrial has no objection to this request. Earlier today, AUSA Daniel Wolf, similarly, confirmed to me that the Government has no objection.

Respectfully submitted,

Daniel L. Stein

cc:

AUSAs Wolf, Fiddelman, and Ghosh (by email)
Pretrial Services Officer Nisbeth (by email)